
EXHIBIT 1

JESSE SBAIH & ASSOCIATES, LTD.
Jesse M. Sbaih (#7898)
Ines Olevic-Saleh (#11431)
The District at Green Valley Ranch
170 South Green Valley Parkway, Suite 280
Henderson, Nevada 89012
Tel (702) 896-2529
Fax (702) 896-0529
jsbaih@sbaihlaw.com
iolevic@sbaihlaw.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PARNELL COLVIN,

Plaintiff,

vs.

M.J. DEAN CONSTRUCTION, INC.;
DOES I through X; AND ROE
CORPORATIONS XI-XX, INCLUSIVE,
inclusive;

Defendant.

Case No.: 2:20-cv-01765-APG-EJY

**PLAINTIFF'S FIRST SUPPLEMENTAL
WITNESS AND DOCUMENT
DISCLOSURES PURSUANT TO FRCP 26
AND LR 26-1**

Plaintiff Parnell Colvin ("Mr. Colvin" or "Plaintiff"), by and through his attorneys of record, JESSE SBAIH & ASSOCIATES, LTD., in accordance with FRCP 26 and LR 26-1, hereby supplements in BOLD type the following information:

I.

WITNESSES

1. Parnell Colvin
c/o Jesse M. Sbaih, Esq.
c/o Ines Olevic-Saleh, Esq.
JESSE SBAIH & ASSOCIATES, LTD.
The District at Green Valley Ranch
170 South Green Valley Parkway, Suite 280
Henderson, NV 89012
Ph: (702) 896-2529

1 Mr. Colvin is the Plaintiff in this matter and is expected to testify to, including but not limited
2 to, the facts and allegations in the Complaint on file herein.

- 3 2. Person(s) Most Knowledgeable
4 M.J. DEAN CONSTRUCTION, INC
5 c/o Robert L. Rosenthal, Esq.
6 HOWARD & HOWARD ATTORNEYS PLLC.
7 3800 Howard Hughes Parkway
8 Las Vegas, Nevada 89169
9 Ph: (702) 667-4809

10 The Person(s) Most Knowledgeable of Defendant M.J. Dean Construction, Inc. is expected to
11 testify regarding the facts and allegations in the Complaint on file herein.

- 12 3. Any and all witnesses named by any other party in this action.

- 13 4. Rebuttal witnesses, if necessary.

14 Plaintiff hereby reserves his right to supplement the above list of witnesses as discovery in this
15 matter continues.

16 II.

17 DOCUMENTS

- 18 1. Laborer's International Union of North America Daily Dispatch Report for date April
19 29, 2020 (COLVIN 00001);

- 20 2. Laborer's International Union of North America Daily Dispatch Report for dates May 7,
21 2020 (COLVIN 00002);

- 22 3. Charge of Discrimination from Nevada Equal Rights Commission (COLVIN 00003);

- 23 4. Notice of Right to Sue (COLVIN 00004);

- 24 5. Various photographs taken at M.J. Dean's jobsite during Mr. Colvin's
25 employment (COLVIN 00004-COLVIN 00005);

- 26 6. Any and all documents attached to a pleading/court documents by any party in this
27 action;
28

7. Any and all documents identified by any other party in this action.

Plaintiff hereby reserves his right to supplement the above list of documents as discovery in this matter continues.

III.

CALCULATION OF DAMAGES

Plaintiff is entitled to recover special damages in the amount of approximately \$50,000.00 and general damages in the amount in excess of \$450,000.00. In addition, Plaintiff is entitled to an award of future earnings and punitive damages in an amount to be determined at the time of trial. Plaintiff is also entitled to an award of damages for attorneys' fees and costs of suit.

Plaintiff reserves the right to amend the above stated damages as discovery continues.

DATED this 17th day of May, 2021.

JESSE SBAIH & ASSOCIATES, LTD.

By /s/ Ines Olevic-Saleh
 Jesse M. Sbaih, Esq. (#7898)
 Ines Olevic-Saleh, Esq. (#11431)
 The District at Green Valley
 170 South Green Valley Parkway, Suite 280
 Henderson, Nevada 89012
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

Pursuant to FRCP Rule 5(b), I certify that I am an employee of the law firm of Jesse Sbaih & Associates, Ltd., and that on this 17th day of May, 2021, I caused **PLAINTIFF'S FIRST SUPPLEMENTAL WITNESS AND DOCUMENT DISCLOSURES PURSUANT TO FRCP 26 AND LR 26-1** to be served via electronic/email service to the following:

Robert L. Rosenthal, Esq.
HOWARD & HOWARD ATTORNEYS PLLC.
3800 Howard Hughes Parkway
Las Vegas, Nevada 89169
rosenthal@howardandhoward.com
Attorneys for Defendant

/s/ Ines Olevic-Saleh
An employee of Jesse Sbaih & Associates, Ltd.



